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8 UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON

10 FARMERS INSURANCE COMPANY OF
11 WASHINGTON, as subrogee for Trevor and
12 Andrea Nipges, and Trevor and Andrea Nipges,
13 a marital community,

14 Plaintiffs,

15 vs.

16 POLARIS INDUSTRIES, INC., a Minnesota
17 corporation,

18 Defendants.

No. 2:07-cv-02049-RSM

**STIPULATED MOTION TO EXTEND
DISCOVERY AND DISPOSITIVE
MOTION DEADLINES**

19 Defendant Polaris Industries Inc. ("Polaris"), Plaintiff Farmers Insurance Company of
20 Washington ("Farmers"), and Plaintiff's Trevor and Andreas Nipges ("Nipges") stipulate and
21 move the Court as follows:

22 1. This case was originally filed with Farmers as the only plaintiff.

23 2. On September 24, 2008, Farmers and Polaris stipulated, and this Court ordered, to
24 allow Nipges to intervene in the action and the case schedule was amended. The amendment
25 moved the discovery and dispositive motion deadlines from November 17, 2008 to March 16,

26 Stipulated Motion and Order re: Discovery and
Dispositive Motion Deadlines

2009.

3. The parties have tentatively scheduled mediation for April 22, 2009. To minimize travel of Polaris' counsel, and possibly a representative for the mediation, the depositions of experts are being scheduled for April 21, 2009.

5. The ADR deadline is April 30, 2009. A jury trial is set for June 22, 2009.

6. Additional travel considerations have resulted in depositions being planned in Phoenix and Minnesota (possibly by video) on March 23 and April 1, 2009, respectively.

7. The parties are cooperating in this matter; discovery is anticipated to be completed by the current discovery cut-off date with the exception of the depositions noted.

8. Accordingly, the parties move the Court to continue the discovery deadline from March 16, 2009 to April 22, 2009, and the dispositive motion deadline from March 16, 2009 to May 6, 2009.

Respectfully submitted this 11th day of March, 2009.

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Stipulated Motion and Order re: Discovery and
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All other deadlines shall remain the same. If the parties require additional time to complete discovery, the Court will consider a stipulation to a short continuance of the trial date.

Dated this 16th day of March, 2009

Honorable John C. Coughenour
United States District Court Judge

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